

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CAITLIN O'CONNOR,	)	
	)	Case No. 3:20-cv-00628
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Frensley
THE LAMPO GROUP, LLC,	)	
	)	Jury Demand
Defendant.	)	

**DEFENDANT'S OBJECTIONS AND CORPORATE REPRESENTATIVE  
DESIGNATIONS IN RESPONSE TO PLAINTIFF'S NOTICE OF CORPORATE DEPOSITION**

Defendant, The Lampo Group, LLC, by and through the undersigned counsel and pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, submits the following objections and corporate representative designations in response to Plaintiff's notice of corporate deposition pursuant to Rule 30(b)(6).

At the outset, Defendant categorically objects to these topics to the extent that Plaintiff seeks discovery regarding any documents or communications that are protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Also, many of these topics are, in whole or in part, factually inaccurate. By designating a corporate representative to testify regarding a topic, Defendant does not concede that the topic is accurate.

- 1. Topic No. 1.** The circumstances and events surrounding the termination or departure of Chris Hogan, including the events leading up to the decision, the decisionmakers, and any discussion regarding the decision to terminate Chris Hogan.

**RESPONSE: Defendant designates Suzanne Simms to testify on its behalf regarding this topic.**

2. **Topic No. 2.** The circumstances and events surrounding Chris Hogan's 2018 affair; including but not limited to Defendant's investigation, actions, communications, and response to the allegations of the affair.

**RESPONSE:** Defendant designates Suzanne Simms to testify on its behalf regarding this topic.

3. **Topic No. 3.** Chris Hogan's personnel file including Defendant Production Bates Stamped, DEFENDANT 2208-2293.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

4. **Topic No. 4.** Chris Hogan's employment history, including any and all allegations of extramarital affairs against Mr. Hogan prior in or around 2007 – 2009; including but not limited to Defendant's investigation, actions, communications, and response to the allegations of the affairs.

**RESPONSE:** Defendant designates Suzanne Simms to testify on its behalf regarding this topic.

5. **Topic No. 5.** Plaintiff's termination and violation of Defendant's Core Values, including all communications and discussions.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

6. **Topic No. 6.** Defendant's Righteous Living Policy, including but not limited to its inception, origins, any modifications, and interpretations.

**RESPONSE:** Defendant designates Jack Galloway to testify on its behalf regarding this topic.

7. **Topic No. 7.** Defendant's determination that its Righteous Living Policy prohibits pre-marital sex, including but not limited to who made this determination, the factual and Biblical basis for the assertion that the Bible prohibits pre-marital sex, that this prohibition is based on a Judeo-Christian value, and Defendant's factual basis that this prohibition is consistent with Title VII.

**RESPONSE: Defendant designates Jack Galloway to testify on its behalf regarding this topic.**

8. **Topic No. 8.** Defendant's determination that its Righteous Living Policy does not prohibit oral sex in the context of pre-marital sex or extra-marital affairs, including but not limited to who made this determination, the factual and Biblical basis for the assertion that the Bible prohibits pre-marital but not oral sex, that this exemption is based on a Judeo-Christian value, and Defendant's factual basis that this prohibition is consistent with Title VII.

**RESPONSE: Defendant designates Jack Galloway to testify on its behalf regarding this topic.**

9. **Topic No. 9.** Defendant's Core Values, including but not limited to the inception, origin, modifications, and interpretations of the values.

**RESPONSE: Defendant objects to this topic to the extent that it seeks discovery beyond the Righteous Living Core Value. See Order (Doc. #27). Defendant designates Jack Galloway to testify on its behalf regarding this topic.**

**10. Topic No. 10.** The circumstances and events surrounding and including the termination of Ms. O'Connor's comparators included in Defendant Production Bates Stamped, DEFENDANT 0078 and 2169.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**11. Topic No. 11.** The circumstances and events surrounding and including the resignation of Kevin Zeillman, including Defendant Production Bates Stamped, DEFENDANT 0519- 00528; 0858-0873; 1324-1348.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**12. Topic No. 12.** The circumstances and events surrounding and including the resignation of Terri Casola, including Defendant Production Bates Stamped, DEFENDANT 0238, 0240-0244, 0248, 0910-0929.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**13. Topic No. 13.** The circumstances and events surrounding and including the resignation of Camden Ferguson a/k/a Camden Weckesser a/k/a Camden Laws, including Defendant Production Bates Stamped, DEFENDANT 0406-0410, 0415.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**14. Topic No. 14.** The circumstances and events surrounding and including the termination of ClintonKnight, including Defendant Production Bates Stamped, DEFENDANT 0469, 0472-0477, 0596-0619, 0652-0670, 0648-0651.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**15. Topic No. 15.** The circumstances and events surrounding and including the termination of SylviaJohnson, including Defendant Production Bates Stamped, DEFENDANT 0435- 0438, 0441, 0902-0909, 1281-1287.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**16. Topic No. 16.** The circumstances and events surrounding and including the resignation of DillonTeagle, including Defendant Production Bates Stamped, DEFENDANT 0488-0492, 0494-0496, 0671-0719, 0773, 1085-1098.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**17. Topic No. 17.** The circumstances and events surrounding and including the resignation of Francois Panzieri, including Defendant Production Bates Stamped, DEFENDANT0282-0283, 0292-0295, 0961-0969.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**18. Topic No. 18.** The circumstances and events surrounding and including the resignation of Steven “Mitch” Riddle, including Defendant Production Bates Stamped, DEFENDANT 0338, 0341-0344, 0350, 0356, 0874-0890.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**19. Topic No. 19.** The circumstances and events surrounding and including the separation of Bruce Coleman, including Defendant Production Bates Stamped, DEFENDANT 0648- 0651.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**20. Topic No. 20.** The circumstances and events surrounding and including the determination of MarcRodriguez continued employment, including Defendant Production Bates Stamped, DEFENDANT 001506-1516, 001521-001529, 001555-001563.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**21. Topic No. 21.** The circumstances and events surrounding and including the termination of Andrew Coss, including Defendant Production Bates Stamped, DEFENDANT 001717-001718, 001722-001730.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**22. Topic No. 22.** The circumstances and events surrounding and including the termination of Ricky Free, including Defendant Production Bates Stamped, DEFENDANT 1762- 001770, 001777-001787, 001917-001924, 001848-001855.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**23. Topic No. 23.** The circumstances and events surrounding and including the termination of Cary Dailey, including Defendant Production Bates Stamped, DEFENDANT 001848- 001855.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**24. Topic No. 24.** The circumstances and events surrounding and including the determination of Ike Elgard's continued employment, including Defendant Production Bates Stamped, DEFENDANT 001810-001817.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

**25. Topic No. 25.** Information about training that you have provided to your managers, including your Human Resources Committee, and your HR managers on the FMLA, Title VII compliance or discrimination from 2019 to present, including the dates of such training, the substance of any such training, who conducted the training, the amount of time spent in any such training, and provide copies of any material that were provided or generated as a result of any such training.

**RESPONSE:** Defendant designates Armando Lopez to testify on its behalf regarding this topic.

Respectfully submitted,

/s/Daniel Crowell

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**CERTIFICATE OF SERVICE**

I certify that, on September 24, 2021, I sent a copy of *Defendant's Objections and Corporate Representative Designations in Response to Plaintiff's Notice of Corporate*

*Deposition* via e-mail to:

Heather Moore Collins  
Anne Bennett Hunter  
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